

<b>FILED</b> CLERK, U.S. DISTRICT COURT	
02/28/2024	
CENTRAL DISTRICT OF CALIFORNIA	
BY: <u>DVE</u> DEPUTY	

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UNITED STATES OF AMERICA,

Plaintiff,

v.

TIBET ERGUL,

Defendant.

CR No. 8:23-100(B)-CJC-2

S E C O N D  
S U P E R S E C T I O N  
I N F O R M A T I O N G

[18 U.S.C. § 1366(a): Conspiracy to Damage an Energy Facility; 18 U.S.C. § 248(a) (3): Intentional Damage to a Reproductive Health Services Facility]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1366(a) ]

A. OBJECT OF THE CONSPIRACY

Beginning on an unknown date and continuing through approximately June 14, 2023, in Orange County, within the Central District of California, defendant TIBET ERGUL conspired and agreed with Unindicted Co-Conspirator No. 1 ("UICC 1") and others to knowingly and willfully damage the property of an energy facility, namely, a Southern California Edison electrical substation, and to cause significant interruption to and impairment of the facility's

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1 functioning, in violation of Title 18, United States Code, Section  
2 1366(a).

3 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
4 ACCOMPLISHED

5 The object of the conspiracy was to be accomplished, in  
6 substance, as follows:

7 1. UICC 1 would devise an operation plan and gear list to  
8 carry out an attack on a substation.

9 2. Defendant ERGUL and UICC 1 would obtain weapons with which  
10 to commit the attack, to include firearms.

11 3. Defendant ERGUL and UICC 1 would consult with others about  
12 how to carry out the attack.

13 4. Defendant ERGUL would select an electrical substation to  
14 target.

15 5. Defendant ERGUL, UICC 1, and others would use the firearms  
16 to shoot at critical components of the substation, thus damaging the  
17 substation and causing significant interruption to and impairment of  
18 the substation's functioning.

19 C. OVERT ACTS

20 In furtherance of the conspiracy, and to accomplish its object,  
21 on or about the following dates, defendant ERGUL and others committed  
22 various overt acts within the Central District of California,  
23 including, but not limited to, the following:

24 Overt Act No. 1: On an unknown date, UICC 1 devised an operation  
25 plan and gear list for attacking a Southern California Edison  
26 substation, which he saved as a .txt file on a thumb drive titled  
27 "Delete after reading."

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1       Overt Act No. 2: On an unknown date, UICC 1 obtained several of  
2 the items on the gear list, including a Zastava ZPap M70 rifle with a  
3 handwritten Cyrillic message translating to "total [n-word] death."

4       Overt Act No. 3: On an unknown date, defendant ERGUL obtained a  
5 rifle.

6       Overt Act No. 4: On an unknown date, defendant ERGUL and UICC 1  
7 consulted with an associate about conducting surveillance, drone  
8 operations, and firearms.

9       Overt Act No. 5: On or about March 26, 2023, defendant ERGUL  
10 scouted substations in the Orange County area to determine possible  
11 targets for an attack.

12       Overt Act No. 6: On or about March 26, 2023, defendant ERGUL  
13 messaged UICC 1 and another associate to tell them he had selected a  
14 substation with a fenced area close to a critical switch.

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1 COUNT TWO

2 [18 U.S.C. § 248(a)(3)]

3 On or about March 13, 2022, in Orange County, within the Central  
4 District of California, and elsewhere, defendant TIBET ERGUL  
5 intentionally damaged the property of a facility which provided  
6 reproductive health services, namely, a Planned Parenthood clinic.  
7 Defendant acted because the Planned Parenthood clinic was and had  
8 been providing reproductive health services.

9  
10 E. MARTIN ESTRADA  
11 United States Attorney



12  
13 CAMERON L. SCHROEDER  
14 Assistant United States Attorney  
Chief, National Security Division

15 DAVID T. RYAN  
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